IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND Greenbelt Division

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|) Civil Action 8:16-cv-00058-PWG |
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JOINT MOTION TO EXTEND TIME TO REQUEST MODIFICATION OF INITIAL SCHEDULING ORDER

Plaintiffs, James L. Williams and Hector Hernandez ("Plaintiffs"), and Defendant, CoreLogic SafeRent, LLC ("SafeRent"), through their counsel, respectfully request that this Court briefly extend the deadline to submit a "request for modification of initial Scheduling Order," currently scheduled for April 1, 2016. In support of their joint motion, the parties state as follows:

- 1. On March 15, 2016, the Court established a deadline of April 1, 2016 to request modification of the deadlines set forth in the initial Scheduling Order. (Dkt. No. 10.)
- 2. After the initial Scheduling Order and Discovery Order were issued, Plaintiffs amended the Complaint on March 24, 2016 to add Plaintiff Hernandez to the case and to also assert three putative nationwide class claims against SafeRent, along with certain other individual claims on behalf of both Plaintiffs.
- 3. On March 29, 2016, the parties attended the Rule 16 initial conference with the Court to discuss the case, where they noted their agreement to modify certain terms of the Scheduling Order due to the changed nature of the case.

- 4. From March 30-31, 2016, counsel for the parties were travelling and unable to connect to discuss those issues.
- 5. Counsel for the parties continue to discuss their proposed modifications to the Scheduling Order. However, due to their schedules, they request a brief extension of time to submit their filing to the Court.
- 6. For those reasons, the parties jointly request that they be permitted to submit their request for a modification of the initial Scheduling Order to the Court on or before April 6, 2016.
- 7. This is the first requested extension of the deadline, and it will not affect any other deadlines in the case.

WHEREFORE, Plaintiffs, James L. Williams and Hector Hernandez, and Defendant, CoreLogic SafeRent, LLC, jointly request that the deadline to request modification of the initial Scheduling Order be extended until April 6, 2016.

JAMES L. WILLIAMS and HECTOR HENANDEZ

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CERTIFICATE OF SERVICE

I hereby certify that on this 1st April, 2016, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing (NEF) to the following:

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